

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

RASUL ROE, *et al.*,

Plaintiffs,

v.

ALEJANDRO N. MAYORKAS, *et al.*,

Defendants.

Civ. Case No. _____

**PLAINTIFFS' MOTION TO REDACT COMPLAINT
AND FILE UNREDACTED COPY UNDER SEAL**

Plaintiffs hereby respectfully request that this Court **GRANT** this motion to permit them, pursuant to Fed. R. Civ. P. 5.2 and Local Rule 7.2, to redact from the Complaint identifying information and information that could be used to locate or harm them, and file an unredacted Complaint under seal. Plaintiffs are submitting an accompanying memorandum of law in support of this motion.

The information that Plaintiffs seek to redact could be used to identify or harm them and should not be disclosed to the public for the reasons set forth in their supporting memorandum of law. Due to the prominent positions many of the Plaintiffs held in the U.S.-backed Afghan government and Afghan civil society, and their associations with specific people, places, and institutions, the information Plaintiffs seek to redact would reveal their identities or locations and movements despite the use of Pseudonyms. That revelation would put them at risk of grave harm at the hands of the Taliban and other hostile individuals and groups.

Due to the significant harm Plaintiffs could face if their identities and other information become public, and uncertainty over whether they will be able to enter the United States, Plaintiffs

ALLOWED
WALL D. J.
5/22 27/22